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September 14, 2023

Via ECF

The Honorable P. Kevin Castel, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *MVN Entertainment, LP v. Sakar International, Inc.*, in paragraph
No. 23-cv-2772-PKC

The existing CMO/so
closes fact discovery on September 15,
2023. The Court will
stay proceedings until
October 18, 2023. If the
action is not settled by
October 18, 2023, the date
5 will be extended by 30 days.
SO ORDERED

Dear Judge Castel:

This firm represents Defendant Sakar International, Inc. ("Defendant") in the above-referenced matter. The next case Management Conference in this matter is currently scheduled for January 5, 2024, and is the next conference scheduled with the Court.

The Parties hereby jointly request a 30-day stay of all deadlines in this action to allow the Parties to finalize settlement negotiations and document the settlement between the Parties. *USDS* *9-18-23*

Plaintiff's counsel has consented to this request. This is the first request for a stay of this action submitted by either party. Defendant previously requested an extension of time to respond to the Complaint, which was granted by the Court. (ECF No. 12). This stay is not sought for any improper purpose and no Party will be prejudiced by this brief stay. In the unlikely event that the parties are unable to finalize settlement papers within the 30 days, the Parties will work together in good faith to present a revised Case Management Plan & Scheduling Order to the Court.

Accordingly, the Parties request a 30-day stay of this action.

The Honorable P. Kevin Castel

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September 14, 2023

Respectfully submitted,

AMSTER, ROTHSTEIN & EBENSTEIN LLP

/s/ Douglas A. Miro
Douglas A. Miro

cc: All Counsel of Record via ECF